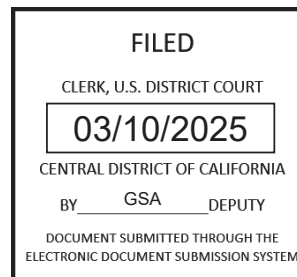


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6 *In Propria Persona*



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8 **UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA**

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10 **WESTERN DIVISION**

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12 **TODD R. G. HILL, et al,**

13
14 **Plaintiffs**

15
16 **vs.**

17 **THE BOARD OF DIRECTORS,**
18 **OFFICERS AND AGENTS AND**
19 **INDIVIDUALS OF THE PEOPLES**
20 **COLLEGE OF LAW, et al.,**

21
22 **Defendants.**

CIVIL ACTION NO. 2:23-cv-01298-CV-BFM

The Hon. Cynthia Valenzuela
Courtroom 5D, 5th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

**PLAINTIFF'S MOTION FOR IMMEDIATE
RULINGS ON OUTSTANDING REQUESTS
FOR JUDICIAL NOTICE (DOCKETS 197 &
199) AND RECONSIDERATION OF
MAGISTRATE'S RECOMMENDATION OF
DISMISSAL WITH PREJUDICE**

NO ORAL ARGUMENT REQUESTED

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28 **PLAINTIFF'S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS
FOR JUDICIAL NOTICE (DOCKETS 197 & 199) AND RECONSIDERATION OF
MAGISTRATE'S RECOMMENDATION OF DISMISSAL WITH PREJUDICE**

CASE 2:23-CV-01298-CV-BFM

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FOR JUDICIAL NOTICE (DOCKETS 197 & 199) AND RECONSIDERATION OF
MAGISTRATE’S RECOMMENDATION OF DISMISSAL WITH PREJUDICE**

TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:

Plaintiff respectfully moves this Court to immediately rule upon Plaintiff’s outstanding Requests for Judicial Notice (Dockets 197 and 199), which have remained unresolved despite their clear relevance and procedural necessity. The Court’s continued failure to address these motions substantively prejudices Plaintiff’s claims and violates fundamental principles of procedural fairness and due process.

The Magistrate Judge recently recommended dismissal of Plaintiff’s claims with prejudice (Docket 213), despite the absence of explicit rulings on critical evidentiary submissions in Dockets 197 and 199. These submissions directly bear upon Plaintiff’s constitutional and procedural claims, offering substantial evidence of systemic governance failures, procedural irregularities, and due process violations by Defendants.

Moreover, Plaintiff notes that the Magistrate’s Interim Recommendation to dismiss with prejudice neglects to consider the binding constitutional framework outlined in *Students for Fair Admissions v. Harvard*, 600 U.S. 181 (2023), despite Plaintiff’s explicit request (Docket 232) and this Court’s own acknowledgment of the authority’s relevance. While formal judicial notice of

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published case law may be unnecessary, explicit acknowledgment and substantive consideration of its controlling authority remains imperative to the constitutional claims presented.

The Court's persistent delay in addressing Dockets 197 and 199, coupled with the Magistrate's recommendation of dismissal with prejudice, materially prejudices Plaintiff's right to procedural fairness and substantive constitutional review. Plaintiff respectfully asserts that continued avoidance of these rulings undermines public trust, transparency, and judicial fairness, creating potential appellate risks and further complicating procedural management.

Plaintiff therefore respectfully requests:

1. An immediate and explicit ruling by this Court on Plaintiff's Requests for Judicial Notice (Dockets 197 and 199).
2. Explicit substantive consideration of Plaintiff's constitutional claims, including the strict scrutiny analysis mandated by *Students for Fair Admissions v. Harvard*, 600 U.S. 181 (2023).
3. A reconsideration of the Magistrate Judge's recommendation for dismissal with prejudice pending resolution of the above outstanding evidentiary and constitutional matters.

Plaintiff respectfully submits these requests to ensure procedural fairness, transparency, and adherence to constitutional principles fundamental to the proper administration of justice.

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CASE 2:23-CV-01298-CV-BFM

1 Respectfully submitted,

2 Dated: March 10, 2025

3 Respectfully submitted,

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7

8 Todd R. G. Hill
9 Plaintiff, Pro Se

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11 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

12 The undersigned party certifies that this brief contains 360 words, which complies with the 7,000-
13 word limit of L.R. 11-6.1.

14 Respectfully submitted,

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18

19 March 10, 2025

20 Todd R.G. Hill

21 Plaintiff, in Propria Persona

22
23 **Plaintiff's Proof of Service**

24 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-
25 3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a
26

27 **PLAINTIFF'S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS**
28 **FOR JUDICIAL NOTICE (DOCKETS 197 & 199) AND RECONSIDERATION OF**
MAGISTRATE'S RECOMMENDATION OF DISMISSAL WITH PREJUDICE

CASE 2:23-CV-01298-CV-BFM

document causes a “Notice of Electronic Filing” (“NEF”) to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Todd R.G. Hill'. The signature is stylized with a large loop and a horizontal line extending to the right.

March 10, 2025

Todd R.G. Hill

Plaintiff, in Propria Persona

**PLAINTIFF’S MOTION FOR IMMEDIATE RULINGS ON OUTSTANDING REQUESTS
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